

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE: NATIONAL PRESCRIPTION OPIATE LITIGATION	Case No. 1:17-MD-2804
<i>APPLIES TO ALL CASES</i>	Hon. Dan. A. Polster

**NOTICE OF FILING UNREDACTED AND/OR LESS REDACTED PLAINTIFFS'
MEMORANDUM IN OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY
JUDGMENT ON PLAINTIFFS' CIVIL CONSPIRACY, RICO AND OCPA CLAIMS
and RELATED EXHIBITS**

Plaintiffs hereby provide notice of, and file into the public record, the attached unredacted and/or less redacted pre-trial brief and exhibits. Pursuant to the Order Regarding Redacting and Sealing of Documents (Doc. No. 2909), various confidentiality rulings, meet and confers between Plaintiffs, Defendants and third parties, and/or the resulting withdrawal of confidentiality designations, the attached previously redacted materials are hereby publicly filed as unredacted or less redacted. In the interest of clarity and completeness, Plaintiffs hereby re-refile the related brief (with less redactions) and less redacted or unredacted exhibits attached hereto. Finally, for tracking and/or cross-referencing purposes, the below chart lists the original filing events related to the documents that are being re-filed, their prior ECF numbers, and the prior and present state of redactions.

Document Title	Ex. #	Prior Public ECF No.	Prior Redactions	Current Redactions
Plaintiffs' Opposition to Defendants' Motions for Summary Judgment on Plaintiffs' Civil Conspiracy, RICO and OCPA Claims (PSJ3)		2182	Yes	Fewer
Draft Speech - Purdue Pharma Mark's Speech - 1/10/2000 PDD8801201589	26	Omitted in error in previous filing	n/a	None now

Memorandum - Global Controlled Substance Compliance Procedure, Identification and Review of Peculiar Orders, Originator: Karen Harper, October 29, 2010 MNK-T1_0000264260	298	2350-91	Yes	None now
Email - FINAL McKesson White Paper on Opioid Abuse - McKesson to Endo, Purdue & MNK, July 19, 2017 MCKMDL00667620	317	2350-110	Under seal	None now
Cardinal Health/Endo - Confidentiality and Restricted Use Agreement dated 1/16/2014 ENDO_HSGAC_0012601	330	2350-123	Yes	None now
HDMA Document - Crisis Protocol, Scenario Planning and Messaging HDA_MDL_000087762	355	2357-20	Temporarily sealed	Fewer
HDMA Staff Performance Appraisal Form 2008, Anita Ducca, January-December 2008 HDA_MDL_000117158	393	2357-58	Temporarily sealed	Fewer
HDMA Document - Government & Public Policy Council (GPPC) and Specialty and Biotech Distributors Council (SBDC) Meeting, February 7-8, 2013 ABDCMDL00284760	499	2364-54	Temporarily sealed	Fewer
Email - From Nicholas Rausch to Steven Mills, January 21, 2013, Subject: RE: Maximum Allowable Quantity Question CAH_MDL2804_00783525	570	2371-26	Yes	Fewer
Contract - Wholesale Supply Agreement bwn CAH and CVS, July 1, 2009 CVS-MDLT1-000030817	576	2371-32	Yes	None now
Contract - Wholesale Supply Agreement bwn CAH and CVS CVS-MDLT1-000030892	577	2371-33	Yes	None now

CVS Document - Evaluation of Suspicious Orders Monitoring System for CVS/Caremark, by The Drug & Chemical Advisory Group, April 6, 2012 CVS-MDLT1-000125301	578	2371-34	Yes	None now
Letter - From CVS to Cardinal Health, January 6, 2011, RE: Cardinal Concerns About CVS #0174, 1136,2732, 2848 and 3639 CAH_MDL2804_02364440	580	2371-36	Yes	None now
Email - From Steve Mays to Chris Zimmerman (and others), January 30, 2013, Subject: RE: Question on OMP ABDCMDL00285348	600	2371-56	Yes	None now
Email - From Edward Hazewski to Natasha Polster (and others), April 8, 2014, Subject: Data, Attachment: WAG Orders held.xlsx ABDCMDL00282490	601	2371-57	Yes	Fewer
Email - From Elaine Thomet to Sam Thompson (and others), August 5, 2014, Subject: FW: " Topco Member CSMP Meetings - due by September MCKMDL00445881	617	2371-73	Under seal	None now
Rite Aid Document - Project Initiation for 5046 Suspicious Order Monitoring, October 2, 2013 Rite_Aid_OMDL_0040184	631	2371-87	Yes	Fewer
Letter - From BuzzeoPDMA to Robert Brown, Regulatory Compliance, ANDA, November 12, 2015, with enclosure: "Suspicious Order Monitoring Assessment" Anda_Opioids_MDL_0000093641	639	2371-95	Yes	Fewer
Direct Sales v. U.S. Folder (continued from above) WMT_MDL_000043712	667B	2371-124	Yes	None now

Dated: December 17, 2019

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 17th day of December, 2019, I have electronically filed the foregoing with the Clerk of Court using the CM/ECF System. Copies will be served upon counsel of record by, and may be obtained through, the Court's CM/ECF System.

/s/ Anthony D. Irpino
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